

EXHIBIT B

Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**DECLARATION IN SUPPORT OF DENZEL ANDERSON'S
MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

I, Denzel Anderson, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I submit this declaration in support of *Denzel Anderson's Motion for Relief from the Automatic Stay* (the "Motion").² I am over 18 years of age, and I am competent to submit this declaration.

2. I am an individual diagnosed with cerebral palsy.

3. My disability limits my ability to stand, bend, and lift objects.

4. From 2021 through 2024, I was employed by Big Lots at a retail store located in Ypsilanti, Michigan.

5. In January 2024, I became subject to persistent verbal harassment and bullying from a co-worker about my walking limp.

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores – PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores – CSR, LLC (6182); CSC Distribution, LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors' corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

² Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to them in the Motion.

6. My limp is caused by my cerebral palsy.
7. During 2024, on multiple occasions, I reported to my supervisors that this co-worker was consistently harassing and bullying me and requested intervention.
8. I do not believe that any action was taken to address this co-worker's behavior or to protect me from further harassment and bullying.
9. The bullying and harassment continued.
10. On or about May 30, 2024, this co-worker choked me.
11. I immediately reported this incident to my supervisors and store management.
12. I do not believe that any corrective or disciplinary action was taken regarding this incident.
13. On May 31, 2024, I was required to work another shift with this co-worker.
14. On May 31, 2024, this co-worker and her significant other assaulted me and punched me while I was working my shift.
15. Due to my disability, I was unable to defend myself.
16. I was transported by ambulance to a nearby hospital for treatment of my wounds and the injuries sustained as a result of the assault.
17. I have suffered significant physical and emotional injuries as a result of these attacks and harassments.

Date: March 10, 2025


Denzel Anderson